## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

## IN RE NATIONAL PRESCRIPTION OPIATE LITIGATION

This document relates to: County of Summit, Ohio, et al. v. Purdue Pharma L.P., et al. Case No. 1:18-OP-45090

The County of Cuyahoga v. Purdue Pharma L.P., et al.
Case No. 17-OP-45004

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

## NOTICE OF SERVICE OF AND OF SEALING TO PRESERVE CONFIDENTIAL INFORMATION IN MANUFACTURER DEFENDANTS' REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT THAT PLAINTIFFS' STATE-LAW CLAIMS ARE PREEMPTED AND THEIR FEDERAL CLAIMS ARE PRECLUDED

Pursuant to the Directions Regarding Filing of Briefs Under Seal, ECF No. 1719, Manufacturers hereby provide notice that on August 16, 2019, they served unreducted copies of the following documents on all Parties, the Court, and the Special Masters:

- Manufacturer Defendants' Reply in Support of Motion for Summary Judgment that Plaintiffs' State-Law Claims Are Preempted and Their Federal Claims Are Precluded; and
- Manufacturer Defendants' Summary Sheet of Issues Raised in Manufacturer Defendants' Reply in Support of Motion For Summary Judgment That Plaintiffs' State-Law Claims Are Preempted And Their Federal Claims Are Precluded.

Dated: August 16, 2019 Respectfully submitted,

/s/ Mark S. Cheffo
Mark S. Cheffo
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, NY 10036

Tel: (212) 698-3500 Mark.Cheffo@dechert.com

Counsel for Defendants Purdue Pharma L.P., Purdue Pharma Inc., and The Purdue Frederick Company

Co-Liaison Counsel for the Manufacturer Defendants<sup>1</sup>

/s/ Carole S. Rendon

Carole S. Rendon
BAKER & HOSTETLER LLP
Key Tower 127 Public Square, Suite 2000
Cleveland, OH 44114-1214
Telephone: (216) 621- 0200
Fax: (216) 696-0740
crendon@bakerlaw.com

Counsel for Defendants Endo Health Solutions Inc. and Endo Pharmaceuticals Inc.; Par Pharmaceutical, Inc., and Par Pharmaceutical Companies, Inc.

Co-Liaison Counsel for the Manufacturer Defendants

<sup>&</sup>lt;sup>1</sup> Teva Pharmaceutical Industries Ltd., Allergan plc, and Mallinckrodt plc are respectively an Israeli corporation, Irish holding company, and an Irish company that are not subject to and contest personal jurisdiction for the reasons explained in their motions to dismiss for lack of personal jurisdiction; they are specially appearing to join this motion, and, thus, they do not waive and expressly preserve their personal jurisdiction challenges.

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 16, 2019, a copy of the foregoing Notice of Service of and Sealing to Preserve Confidential Information in Manufacturer Defendants' Reply in Support of Motion for Summary Judgment that Plaintiffs' State-Law Claims Are Preempted and Their Federal Claims Are Precluded has been served on the Parties, the Court, and the Special Masters pursuant to the Directions Regarding Filing of Briefs Under Seal (ECF No. 1719).

Dated: August 16, 2019 By: /s/ Jonathan L. Stern

Jonathan L. Stern Arnold & Porter Kaye Scholer LLP 601 Massachusetts Ave. NW Washington, DC 20001 Tel: (202) 942-5000 jonathan.stern@arnoldporter.com

Attorneys for Endo Health Solutions Inc., Endo Pharmaceuticals Inc., Par Pharmaceutical, Inc. and Par Pharmaceutical Companies, Inc.